

General Comments

1. **Section 3:** The various water screening levels for metals are based on different forms (dissolved, total recoverable, or total); this should be articulated in this section to assist sites in determining the appropriate sampling and evaluation methodology.
2. **Sections 4.1 and 5:** Section 4.1 describes five contaminant transport pathways (direct discharge, groundwater, bank erosion, overwater activities and air deposition). Yet in Section 5, which describes the source control screening process, screening for the source control process for overwater activities is not described. How will DEQ evaluate these sources?
3. **Appendix D:** This is titled DEQ Stormwater Investigation Approach but the appendix is more of a stormwater overview, a description of regulatory programs, and City outfall work. To avoid confusion, would it be better to rename this appendix?

Specific Comments

1. **Section 4.1, 1st bullet, last sentence:** Please strike “municipal wastes” from this sentence. The City does not have any permitted (or unpermitted) municipal waste discharges into the Portland Harbor. As discussed in other parts of the document, the City’s discharge point for the Columbia Boulevard Wastewater Treatment Plant is in the Columbia River.
2. **Section 4, page 4-1, footnote:** To make the description of CSOs more accurate, we suggest the following changes:

“CSO events are ~~combined~~ untreated discharges of ~~combined~~ storm water, ~~municipally and sanitary sewage from residential, commercial, and permitted industrial sources discharges, and untreated sewage that overflow from the sewer system is released directly~~ into the river during heavy rainfall periods when the amount of storm water and sewage exceeds the ~~sewers have reached their capacity of the collection system.~~”

3. **Section 4.2, First paragraph:** The term “complete pathway” used in this paragraph can have many different meanings (i.e., simple physical transport or a risk exposure definition). To be consistent with the language used in DEQ’s upland tracking spreadsheet, the City suggests this term be defined in this paragraph and then consistently applied in the document. We suggest the paragraph be modified to:

“In general, upland site characterization activities follow the CERCLA Preliminary Assessment (PA), Site Investigation (SI), Remedial Investigation (RI) process outlined in DEQ and EPA guidance. Upland investigations should focus on identifying ~~media impacted by contaminants (sources) and whether there is a complete transport contaminant migration pathway to the Willamette River exists.~~ A complete contaminant migration pathway to the river includes media impacted by contaminants (sources) and one or more potentially complete transport pathways. In some cases, PA or SI level information may be adequate to determine that an upland facility is not a source of contamination (i.e., a complete contaminant migration pathway does not exist) to the Willamette River. However, it may be necessary to collect RI level data at upland sites with a known or potentially complete contaminant migration pathway to the Willamette River.”

For consistency in the document, this change would require small wording changes in several additional locations, such as:

- Section 4.4, Second Paragraph, first bullet: "...contaminant ~~transport~~ migration pathway from...";
 - Section 4.4.2, First Sentence: "...significantly and there is a known or potentially complete contaminant migration pathway to the river."
4. **Section 5.1, First bullet:** The text states that "...wind erosion of soil is not considered a pathway, and is not further considered in the JSCS." While wind erosion is not likely a significant transport mechanism during normal site operations, during remediation or redevelopment/development activities airborne contaminated soil, especially at sites adjacent to the river, could be significant. Is there some way to capture this so appropriate source control measures can be employed during these activities?
 5. **Section 5.3, First paragraph, last sentence:** Please strike "municipal wastes" from this sentence (see Specific Comment 1 for explanation)
 6. **Section 5.3, Page 5-7, Second paragraph, third sentence:** It states that "...and most public conveyances should be evaluated by the City of Portland." Other public entities, such as the Port of Portland and ODOT, are responsible for evaluating their own respective systems. For accuracy, we suggest the following changes: "... and ~~most the~~ public conveyances should be evaluated by ~~the City of Portland~~ the appropriate public agency."
 7. **Section 5.3, Page 5-8, last paragraph, third sentence:** It is unclear why "(i.e., shared conveyances)" is given as the explanation for point of discharge. Should this read: (e.g., outfall or connection to a shared conveyance system)?
 8. **Section 5.4, pages 5-11 and 5-12.** The first two sentences on the bottom of 5-11 and continuing on page 5-12, read:

"For public and private storm drains and municipal CSO systems, source identification and control must be responsive to the local conditions and source-specific situations. Source control efforts should be documented by local jurisdictions and evaluated to determine whether these actions prevent or minimize recontamination of sediments above the Portland Harbor cleanup goals to be set in the EPA ROD(s)".

This implies that the local jurisdictions will be documenting source control efforts at both public and private storm drains. While the City is committed to working with DEQ to document source control efforts within its stormwater conveyance system, DEQ would be documenting source control efforts at sites that do not discharge to the City's system and at sites in the Cleanup Program.
 9. **Section 7.1.2.2, first bullet:** Suggest changing this to:

"Describe the nature and extent of contamination at the ground surface or subsurface draining to the ~~in the proximity of~~ catch basins or other conveyances to the storm water system" since sources not immediately adjacent to the catch basin may also contribute to storm water."
 10. **Section 7.1.2.2, third bullet:** Please explain what is meant by baseline discharge.

11. **Appendix A.3.2, page A-4, 2nd paragraph, last sentence:** To more accurately reflect the City's role, please make the following change:

"The City of Portland administers, on behalf of DEQ, the ~~its own~~ NPDES 1200-Z..."

12. **Appendix A.3.3, page A-7:** The section on the City's MS4 permit should be updated to reflect the current status of the permit. The "second permit term" for the NPDES MS4 permit is referred to as September 1, 2000 through August 31, 2005. The term is March 8, 2004 to February 28, 2009. Please consider replacing the last paragraph with the following:

"At the end of the first five-year cycle, the City and its co-permittees (the Port of Portland and Multnomah County) submitted a permit renewal package to DEQ. The permit was renewed for a second term in March 2004. DEQ subsequently reconsidered the second-term permit and reissued a modified permit in July 2005. The permit expires on February 28, 2009."

13. **Appendix A.3.4, page A-7, 3rd paragraph, last sentence:** Separated stormwater in the St Johns area is treated a several facilities. Please change this sentence to:

"The storm water in the St. Johns area that was separated from the combined system is now discharged through treatment facilities before discharging to the river ~~treated at the Ramsy Lake constructed wetland~~.

14. **Appendix A.3.4, page A-7, last paragraph, 2nd sentence:** Please add the following change to clarify when CSO controls will be implemented:

"These CSOs are expected to be controlled as proposed CSO facilities come on-line by 2006 (for the west side) and 2011 (for the east side)."

15. **Appendix A.3.4, page A-7, last paragraph, last sentence:** We believe that the following changes reflect DEQ's intent:

"Because CSO controls ~~will have~~ significantly reduced the volume of ~~sewage storm water~~ entering Portland Harbor through the CSO outfalls, DEQ source control efforts will focus on ~~separated~~ storm water discharges."

16. **Appendix D, page D-3, 3rd paragraph, 1st sentence:** This paragraph says that Appendix A lists the upland sites with NPDES permits. Appendix A only lists the sites with individual permits, not those with general permits. Perhaps you could reference the LWG's Programmatic Work Plan for the list of general stormwater permits (with the caveat that this list can change as facility ownership and operations change).

17. **Appendix D, page D-3, last paragraph, 1st sentence:** To more accurately reflect the catch basin sampling objectives laid out in Appendix E, we suggest the following changes:

"Catch basin sediment has been sampled during investigations at some upland sites to identify hazardous substances that might be contained for the purpose of characterizing potential sediment concentrations in storm water discharges to the Willamette River and to determining whether further site-specific investigation is warranted."

18. **Appendix D.3, Page D-5, Development Standards bullet:** The City's Manual was last updated in September 2004. Please change the date in this bullet. If you think it would be useful to include a link to this information, it can be found at:
<http://www.portlandonline.com/bes/index.cfm?c=35117>

19. **Appendix E, Page 4-1, 1st paragraph, 2nd sentence:** Please change this sentence to: “The City of Portland, Bureau of Environmental Services has ~~adopted~~ developed Standard Operating Procedures...”
20. **Appendix D, Section D.5, Page D-7:** Clarification is needed on which stormwater permits (industrial versus municipal) are being referred to. Suggested text revision:

"The DEQ and the City of Portland have developed guidance on implementation of Best Management Practices (BMPs) to improve storm water quality. BMPs are typically required in response to an exceedance of industrial storm water benchmarks." If referring to NPDES MS4 permits, reword to "BMPs are typically required in response to permit conditions. ~~an exceedance of storm water benchmarks~~.
21. **Appendix D, Last paragraph, Page D-6:** There are several statement that need some clarification, such as:
 - "Regulatory options outside of the NPDES system will also be considered." What does this mean?
 - “Storm water discharges will be monitored to determine if the actions taken to control discharges of contaminants **are effective**.” Effective to NPDES industrial benchmarks, to Superfund PRGs, or something else?
22. **Appendix E, Section 4.2, Page 21:** One sentence in this paragraph reads: “Catch basin sediment sampling (*e.g.*, quarterly, semi-annual) may also provide a good long-term benchmark of BMP effectiveness.” The use of benchmark here may be confusing since it has different meanings under both the MS4 and industrial NPDES permit. Some alternate language:

“Catch basin sediment sampling results (*e.g.*, quarterly, semi-annual) may also provide a good measure of concentration and mass-load reductions from ~~long term benchmark of BMP implementation effectiveness~~.”
23. **Appendix E, General and specific comments:** The use of the term 'benchmark' in Appendix E may be confusing to the reader. Industrial permits include one definition of this term, while the NPDES MS4 permits use another definition. We assume that this section is primarily talking about industrial sites; if that is the case, we have the following suggestions:
 - **Appendix E, Section 3.1 Page E-17:** "Available site information, including industrial NPDES storm water permit limits or benchmarks, should be incorporated in the selection of screening parameters. This coordination should allow the screening evaluation conducted under the cleanup program to fulfill the monitoring requirements of the industrial NPDES permit."
 - **Appendix E, Section 7.2.3 Storm Water Screening Evaluation, Page 30:** “A summary of the storm water screening results (see Section 6) should be presented in the report. The report should include a discussion of compounds detected, compounds detected above SLVs and/or NPDES industrial benchmarks, magnitude of the exceedance, and a list of any PBTs detected.”